

MEMO ENDORSED

Federal Defenders
OF NEW YORK, INC.

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David Patton
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Deirdre D. von Dornum
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Via Email and ECF
Hon. Richard M. Berman
U.S. District Judge
Southern District of New York
500 Pearl Street
New York, NY 10001

Re: *United States v. Robert Hadden*, 20 Cr. 468 (RMB)

Dear Judge Berman,

March 9, 2023

That's a good idea.
Application Granted.
New sentencing date is
June 20, 2023 @ 9:00 A.M.
Defense submission by
June 1, 2023; Govt 6/8/2023.
SO ORDERED:
Date: 3/9/23
Richard M. Berman
Richard M. Berman, U.S.D.J.

The defense, with the consent of the government, respectfully asks for a 60-day adjournment of sentencing, which is currently scheduled for April 25, 2023, in order to permit the Probation Department sufficient time to conduct its investigation, the defense psychosexual expert (Dr. Alexander Bardey) sufficient time to interview and evaluate Mr. Hadden, and defense counsel sufficient time to put together a thorough submission, taking into account the PreSentence Report and the psychosexual evaluation. Counsel for the defense and the government are available the last week of June, if that is convenient to the Court.

Thank you for your consideration of this request.

Respectfully Submitted,

/s/
Deirdre D. von Dornum
Michael D. Weil
Kathryn Wozencroft
Counsel for Robert Hadden

cc: Counsel of Record (by ECF)
U.S. Probation Officer Ashley Geiser (by E-mail)
Robert Hadden (by U.S. Mail)